

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Rhodie Fowler  
DEBTOR**

**CASE NO: 20-12215  
CHAPTER 13**

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Rhodie Fowler, filed a Motion to Approve Mortgage Loan Modification Agreement with the court requesting to extend the automatic stay provided by 11 U.S.C. 362(a) of the Bankruptcy Code, pursuant to 11 U.S.C. 362(c)(3)(B) of the Bankruptcy Code.

- 1. Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).
- 2. If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the Motion, then on or before October 5, 2021, you or your attorney must file a response to the Motion. (see Instructions on next page).
- 3. A hearing on the Motion** is scheduled to be held before the Honorable Magdaline D. Coleman, on October 14, 2021, at 11:00 a.m. in Courtroom 2, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.
- 4. If you do not file a response to the Motion**, the court may cancel the hearing and enter an order granting the relief requested in the Motion.
- 5.** You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed a response.
- 6.** If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

**7. If you are required to file documents electronically by Local Bankruptcy Rule 5005-1,** you must file your response electronically.

**8. If you are not required to file electronically,** you must file your response at

Clerk of the United States Bankruptcy Court  
901 Market Street, Suite 400  
Philadelphia, PA 19107

**9. If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

**10. On the same day that you file or mail your Response to the Motion,** you must mail or deliver a copy of the Response to the movant's attorney:

David J. Averett, Esquire  
7719 Castor Avenue, Second Floor  
Philadelphia, PA 19152  
Phone: 215-342-5024  
Fax: 215-742-2464  
Email: averettlaw@comcast.net

Date: 9/15/2021